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Attorney for Civil Beat Law Center
for the Public Interest

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KATHERINE P. KEALOHA et al.,

Defendants.

MISC. NO. 18-477

[CR NO. 17-00582 JMS-RLP-1]

MOTION TO UNSEAL COURT
RECORDS; MEMORANDUM IN
SUPPORT OF MOTION TO
UNSEAL COURT RECORDS; and
CERTIFICATE OF SERVICE

MOTION TO UNSEAL COURT RECORDS

Pursuant to the public rights of access guaranteed by the First Amendment of the United States Constitution and the common law, Civil Beat Law Center for the Public Interest (Law Center) moves for this Court to unseal court records filed in *United States v. Katherine P. Kealoha*, Cr. No. 17-00582 JMS-RLP-1. As established in the accompanying memorandum, the parties to the criminal case have not complied with the procedural or substantive requirements for filing documents with the Court under seal.

Absent adequate justification, evidence, and findings of fact for sealing the court records, the documents must be unsealed.

The Law Center respectfully requests that this Court order the following documents unsealed:

- Dkt. 268: 9/10/18 Ex Parte Application by Def. K. Kealoha
- Dkt. 269: 9/12/18 Order re Dkt. 268
- Dkt. 270: 9/12/18 Motion by Def. K. Kealoha
- Dkt. 271: 9/17/18 Order re Dkt. 270
- Dkt. 272: 9/28/18 EO re Def. K. Kealoha
- Dkt. 281: 11/19/18 Motion by United States
- Dkt. 282: 11/19/18 EO re Def. K. Kealoha re Dkt. 281
- Dkt. 283: 11/26/18 Opposition by Def. K. Kealoha re Dkt. 281
- Dkt. 284: [Missing from Docket, but referenced in Dkt. 285]
- Dkt. 285: 11/30/18 Order re Dkt. 281, 284
- Dkt. 286: 12/4/18 EO re Def. K. Kealoha
- Dkt. 287: 12/5/18 EO re Def. K. Kealoha

DATED: Honolulu, Hawai'i, December 14, 2018

/s/ Robert Brian Black

ROBERT BRIAN BLACK

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